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February 22, 2022

Hon. Michael B. Kaplan U.S. Bankruptcy Court 402 E. State Street Trenton, NJ 08608

Re: In the Matter of Michael J Conover

**Chapter 13 Case No.: 21-18934-MBK** 

Motion to Vacate Automatic Stay Ret: 2/23/22 - Adjournment Request

## Dear Judge Kaplan:

The undersigned represents the Debtor's landlord, New Bedford Apartments, LLC. I have conferred with the Debtor's attorney who has indicated the Plan is being amended to provide for the pre-petition rent arrears to be paid over 18 months.

In lieu of the above, we request an adjournment of the motion to the next available date. Mr. Cullari has consented to the adjournment .

Respectfully,

ARONS & ARONS, LLC

Scott Arons

SCOTT ARONS

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Cc: New Bedford Apts. Cc: Francis P. Cullari, Esq..